

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**REPLY IN FURTHER SUPPORT OF MOTION OF ASSURED GUARANTY CORP.,
ASSURED GUARANTY MUNICIPAL CORP., AND AMBAC ASSURANCE
CORPORATION TO EXTEND THE ELECTION DEADLINE IN THE SOLICITATION
PROCEDURES ORDER**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, “Assured”) and Ambac Assurance Corporation (“Ambac,” and collectively with Assured, “Movants”) hereby submit this reply (the “Reply”) in further support of the *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Ambac Assurance Corporation to Extend the Election Deadline in the Solicitation Procedures Order* (ECF No. 18284, the “Extension Motion”)² and respectfully state as follows:

1. Earlier today, on September 30, 2021, the Oversight Board filed a response (ECF No. 18319) to the Extension Motion, indicating that the Oversight Board does not object to the relief requested in the Extension Motion. Specifically, the Oversight Board stated: “The Oversight Board does not object to the Court’s entry of an order clarifying that the Election Deadline is extended to October 18, 2021 at 5:00 p.m. (Atlantic Time) to coincide with the Voting Deadline currently established. Accordingly, the Oversight Board does not object to the entry of the proposed order annexed as Exhibit ‘A’ to the Extension Motion.” See ECF No. 18319 ¶ 1.

2. No other responses have been filed to the Extension Motion, and the deadline for such responses expired at 12:00 pm (Atlantic Standard Time) today (September 30, 2021). See *Order Granting Urgent Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Ambac Assurance Corporation for Expedited Consideration of Motion to Extend the Election Deadline in the Solicitation Procedures Order*, ECF No. 18301 (providing that “Responsive papers to the Motion, if any, must be filed by **September 30, 2021, at 12:00 p.m. (Atlantic Standard Time).**”).

² Capitalized terms not defined in this Reply shall have the meaning ascribed to them in the Extension Motion. References to ECF numbers in this Reply are to the docket in Case Number 17-3283-LTS.

3. Given that the Extension Motion is unopposed, Movants respectfully request that the Court enter the proposed order annexed as Exhibit “A” to the Extension Motion for the reasons stated in the Extension Motion.

[Remainder of Page Intentionally Omitted]

Dated: September 30, 2021
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 30th day of September, 2021.

By: /s/ Howard R. Hawkins, Jr.
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